

Case 1:22-cv-04058-RMB-EAP

October 13, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

DAVID GRECO,

Plaintiff,

v.

DET. LAUREN LAIELLI, SERGEANT

FRANK PACE, NEW JERSEY OFFICE

OF HOMELAND SECURITY AND

PREPAREDNESS

Defendants

RECEIVED

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AT 8:30 _____ M
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Plaintiff David Greco's Brief in Opposition to All Three Defendants Motions To Dismiss My Complaint

Title 42 U.S.C. Section 1983 states " a plaintiff may challenge the presumption of validity afforded a warrant where the magistrate was misled by information contained in the affidavit that the affiant either (1) knew was false or (2) would have known was false had he not recklessly disregarded the truth. The purpose of this article is to discuss the liability that a law enforcement officer may incur in such a situation."

The 5 falsified documents the defendants used to launch a large scale police offensive against the Plaintiff, including evidence they fabricated themselves, exhibit S-7, and exhibit S-9 (the S exhibits were included with my original complaint, but an additional courtesy copy is included with this brief for ease of examination) – On S-9, upon looking at the bottom pictures, you'll see that the lower left hand picture is slightly underneath the picture on the right and it is just slightly cock-eyed. It is not possible for a computer to make such a human "forger" type mistake. A computer positions things on a webpage with structured precision, based on programmed guidelines. S-9 is the result of pieces of paper, cut out by the defendants, and placed onto a copy machine and then the defendants pressed the copy button to

create that document. The defendants fabricated it. Exhibits S2, S-10 and S-11 are all clearly altered evidence, as it's impossible to cross out words/sentences, block out the quoted article, on a computer screen, on a social media sight. All you can do is type with the keyboard and include an article. The defendants themselves crossed out words/ sentences, changed wording, blocked out the article that was being commented on. The result, unquestionable to the human eye, is that the defendants altered the evidence, as part of a preconceived plan to give the altered evidence and the evidence they fabricated, their 5 falsified documents, to a Judge and that's exactly what they did. The defendants falsified documents - Title 42 U.S.C. Section 1983, as well as their preconceived, preplanned powerful lie that "based on evidence she got from the FBI, Mr. Greco was in communication with the Synagogue shooter before the mass shooting", the defendants totally mischaracterized the Plaintiff before a Judge. They didn't just harm my rights, they stole them. They slandered the Plaintiff; they shattered the Plaintiff's rights, by presenting falsified information to the Judge, including 5 falsified documents they made themselves, to begin their assault of the Plaintiff's life, rights, health and future. Statute 42 U.S.C. Section 1983, states a plaintiff may seek compensation for damages done by law enforcement, in the deprivation of their rights, with falsified documents.

Stated within "absolute witness immunity", it says that the officer(s) is Not protected by it, if "they knowing violated the law." The moment that the defendants started to cut out pieces of paper to construct exhibit S-9, a falsified document, they forfeited 'absolute witness immunity". The moment that the defendants started altering the Plaintiff's social media posts, with the plan to admit the altered versions into evidence, they knew they were violating the law. The moment the defendants fabricated evidence, exhibit S-7, the defendants knew they were violating the law. The moment they set any part of this in motion, a preplanned conspiracy, to use fabricated evidence, altered evidence and lies they created with the intention to tell a Judge while testifying under oath in the near future, the criminal conspiracy they planned and were actualizing, the defendants knew that they were violating the law. Absolute witness immunity, does not apply to these defendants.

Statute 42 U.S.C. Section 1983 allows Civil action for deprivation of rights resulting from members of law enforcement using falsified documents. There is no statute of limitations listed in this Statute, so the Plaintiff is allowed to seek damages done to my health, life and future, by the intentional deprivation of my guaranteed rights. I'll elaborate much more fully when my case is heard, but request that the court consider the violations which occurred to the plaintiff, detailed in my original complaint, and still are, as a result of the defendants falsified documents and defamation slander, brought before a Judge the only way such things can be, in absentia, so the Plaintiff could not expose their fabricated and altered evidence, the 5 falsified documents they used to manipulate a Judge toward their conspiracy.

NJ Office of Homeland Security and Preparedness wants a summary Judgement against the Plaintiff's complaint. That's because the defendants conspiracy, to use fabricated evidence, altered evidence and pre-planned perjury, could never have taken place if NJ Office of Homeland Security and Preparedness hadn't given their full power to the defendants, allowing them to testify as "the State", in absentia, protecting them from me exposing their fabrications, their altered evidence, their falsified documents and their lies told to a Judge while testifying under oath. The defendants were enabled to use their falsified documents and enabled to lie to a Judge while testifying under oath, by NJ Office of Homeland

Security and Preparedness. If they had to try and create a Civil case without that power, they would have needed what they didn't have, an actual reason.

As I understand it, a Federal Court usually honors the 'Statute of Limitations' on a Statute such as Defamation slander. I don't believe it's mandatory. I believe that the powerful slander by the defendants can mostly be included under Title 42 U.S.C. Section 1983 by me, but request that the defamation slander by the defendants, just a part of my case, and the defendant's conspiracy, in the Press, should be considered by this court. I believe this because the slander by the defendants in the Press is eternal, if not removed and will therefore continue to sabotage the Plaintiff's life, indefinitely, as the Plaintiff will never see another job interview, if all the prospective employers are tricked into believing that he was in communication with the Synagogue shooter, before the mass shooting. Tricked by the defamation slander by the defendants; a fabricated lie first told to a Judge while they were testifying under oath.

Conclusion: The defendants don't enjoy 'absolute witness immunity' because they knowing violated the law when they fabricated and altered evidence, to create 5 falsified documents, the 5 "S" exhibits included with this Brief and the original complaint. Title 42 U.S.C. Section 1983, a "falsified documents" Statute, says I can seek compensation for deprivation of my rights due to the defendant's falsified documents. Plaintiff has described what happened to me, as a result of the 5 falsified documents and the slander, by the defendants, in my original complaint, but will fully expand on this when my case is heard. Plaintiff officially requests that all 3 of the defendant's motions to dismiss my complaint, be totally denied. The Plaintiff feels that with the "S" exhibits examined, and therefore exposed, he already has brought into the light the defendants falsified documents and deserves the chance to fully expose all, his complaint valid, by his case moving forward, and asks that the defendants Motions to dismiss my complaint be denied.

Thank You

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